

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: DOMESTIC DRYWALL
ANTITRUST LITIGATION**

**MDL No. 2437
13-MD-2437**

THIS DOCUMENT RELATES TO:

All Direct Purchaser Actions

DIRECT PURCHASER PLAINTIFFS' FIRST AMENDED INITIAL DISCLOSURES

Direct Purchaser Plaintiffs make this First Amended Initial Disclosure Statement pursuant to Fed. R. Civ. P. 26(a)(1)(A) and the proposed Initial Discovery Plan submitted by Plaintiffs to the Court on August 2, 2013. (Dkt. 53-1). Direct Purchaser Plaintiffs make these disclosures based on their current knowledge, without benefit of formal discovery in this action, and without waiver of attorney-client privilege, work-product doctrine, or any applicable privilege or protection. Direct Purchaser Plaintiffs reserve the right to amend or to supplement these disclosures in accordance with Fed. R. Civ. P. 26(e).

**(i) Identity of persons reasonably likely to have information that
Direct Purchaser Plaintiffs may use to support their claims:**

Each Direct Purchaser Plaintiff states that the following person(s) within its organization have or had responsibility for the purchase of drywall from Defendants and may have discoverable information:

Grubb Lumber Company, Inc.:

David Arronson
Grubb Lumber Company, Inc.
200 A Street
Wilmington, DE 19801

June Armstrong
Grubb Lumber Company, Inc.
200 A Street
Wilmington, DE 19801

John Connell
Grubb Lumber Company, Inc.
200 A Street
Wilmington, DE 19801

Darrell Evans
Grubb Lumber Company, Inc.
200 A Street
Wilmington, DE 19801

Jeff Haggerty
Grubb Lumber Company, Inc.
200 A Street
Wilmington, DE 19801

c/o Joshua D. Snyder
Boni & Zack LLC
15 St. Asaphs Road
Bala Cynwyd, PA 19004
Tel: (610) 822-0200
Email: jsnyder@bonizack.com

Janicki Drywall, Inc.:

Charles C. Janicki
Janicki Drywall, Inc.
5400 E. Lake Road
Erie, PA 16511

c/o Michael Dell'Angelo
Berger & Montague, P.C.
1622 Locust Street
Philadelphia, PA 19103
Tel: (215) 875-3000
Email: mdellangelo@bm.net

New Deal Lumber & Millwork Co., Inc.:

Phil Miller
President
New Deal Lumber & Millwork Co., Inc.
5149 Lancaster Avenue
Philadelphia, PA 19131

c/o Eugene A. Spector
Spector Roseman Kodroff & Willis, P.C.
1818 Market Street, Suite 2500
Philadelphia, PA 19103
Tel: (215) 496-0300
Email: espector@srgw-law.com

Sierra Drywall Systems, Inc.:

Patrick Pendley
President
Sierra Drywall Systems, Inc.
4716 North Perryville Rd.
Litchfield Park, AZ 85340
Debbie Pendley
Vice President
Sierra Drywall Systems, Inc.
4716 North Perryville Rd.
Litchfield Park, AZ 85340

c/o Kit A. Pierson
Cohen Milstein Sellers & Toll PLLC
1100 New York Ave., NW

Suite 500 West
Washington, DC 20005
Tel: (202) 408-4600
Email: kpierson@cohenmilstein.com

The following individuals may also possess information that Direct Purchaser Plaintiffs may use to support their claims, including information related to purchases of drywall, Defendants' prices for drywall, the use of "job quotes" for drywall, and Defendants' practices of putting purchasers on allocation.

Steve DeLaune
Acoustical Specialties & Supply
12433 S. Choctaw Drive
Baton Rouge, LA 70815
Tel: (225) 275-3440

Bradley Campbell
Campbell Supply Co.
1610 Sewall Avenue
Neptune, NJ 07753
Tel: (732) 775-8800

Mike Casimiro
Casco Construction Corp.
1919 Diamond Creek Drive
Colorado Springs, CO
Tel: (719) 287-8377

Brian King
CF Supply, Inc.
4210 Sayles Boulevard
Abilene, TX 79605
Tel: (325) 675-5095

Douglas Calabrese
The Conking & Calabrese Company
111 Parce Avenue, Suite 2
Fairport, NY 14450
Tel: (585) 388-1111

Stephen Smith
Allsouth Drywall Supply Company
5580 Matt Highway
Cumming, GA 30028
Tel: (678) 513-6993

Daniel Carstens
Building Express, Inc.
4170 US 23 South
Alpena, MI 49707
Tel: (989) 358-0808

James Cauley
Ceiling Systems Distributors
2410 Woodmere Drive
Pittsburgh, PA 15205
Tel: (412) 922-7100

Charlie Anderson
Charleston Acoustics, Inc.
900 MacCorkle Avenue, S.W.
Charleston, WV 25303
Tel: (304) 343-1332

Joe Fortunato, Jr.
Fortune Gypsum Products
3173 Fire Road
Egg Harbor Township, NJ 08234
Tel: (609) 646-9350

Brian Roll
George J. Roll & Sons, Inc.
2258 Vermont Street
Blue Island, IL 60406
Tel: (708) 385-0175

Kyle Darr
Home Supply Center, Inc.
711 N. Front Street
Fremont, OH 43420
Tel: (419) 332-3311

Alfred Lattanzio
Lattanzio Lumber Co.
11 Springfield Avenue
Somerset, NJ 08873
Tel: (732) 545-5026

David Pelletier
National Lumber Co.
245 Oakland Street
Mansfield, MA 02048
Tel: (508) 399-8020

Rick Smith
Southwest Building Materials, Ltd.
3401 S. Fillmore
Amarillo, TX 79110
Tel: (806) 379-7866

Aaron Copp
Toll Bros.
400 Travis Court
Irving, TX 75038
Tel: (303) 898-2187

Brent Paugh
Georgia-Pacific LLC
c/o David Debold
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Tel: (202) 955-8500

Dan Cady
Holmes Drywall Supply
1701 W. 25th
Kansas City, MO 64108
Tel: (816) 471-7595

Joseph Coppola
Jafco Supply Corporation
4300 South Clinton Avenue
South Plainfield, NJ 07080
Tel: (908) 668-7800

Mike Bilicki
Marriott Drywall Materials
W229 N2514 Duplainville Road
Waukesha, WI 53186
Tel: (262) 548-9599

Ryan Robinson
Ohio Gypsum Supply
4715 Urbana Road
Springfield, OH 45502
Tel: (937) 323-9562

Steve Finelli
State Road Building Supply Company, Inc.
1840 S. State Road
Upper Darby, PA 19082
Tel: (610) 259-8840

Jerry Barnes
424 Oakwood Circle
Denton, TX 76208
Tel: (940) 321-3225

Mark Atkins
Georgia-Pacific LLC
c/o David Debold
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Tel: (202) 955-8500

Leo Bissonette
Georgia-Pacific LLC
c/o David Debolt
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Tel: (202) 955-8500

Michael Clay
c/o David Debolt
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Tel: (202) 955-8500

Kathryn Thompson
Thompson Research Group
2525 West End Ave. Suite 1440
Nashville, TN 37203
Tel: (615) 891-6206

Robert B. Bruce B.Sc. Ph. D.
Innogyps
7 Innovation Drive
Unit 122
Flamborough, Ontario
L9H 7H9 Canada
Tel: (905) 690-6161

In addition, present and former employees of the Defendants and their wholly-owned subsidiaries who had responsibility regarding pricing, the terms and conditions of sale (including job quotes), and supply of drywall may also possess information that Direct Purchaser Plaintiffs may use to support their claims:

Eagle Materials, Inc./American Gypsum Company LLC

David Bates

Bennie Lenox

Keith Metcalf

David Powers

Mary Schafer

Brad Tonkin

Don Warner

Susan Hall

PABC0 Building Products, LLC

Mark Burkhammer

Brian Hobdy

Phil Kohl

Emil Kopilovich

Ryan Lucchetti

Todd Thomas

Mike Willoughby

Richard Ladwid

Sergio Mazzocato

Dean Smith

CertainTeed Corporation

Keith Campbell

John Donaldson

Dave Engelhardt

Steve Hawkins

Daniel T. Kennard

Darrell Williams

Jim Hand

Joe Alonzo

Renee Chesler

Gerard Daniels

Frank Demarinis

Ray Deemer

Ed Maloney

Bill Mazurie

Chris Mehl

Randy Monahan

Mark Salmon

Lafarge North America Inc.

David Briggs

Jay Conlin

Steve DeMay

TIN Inc. d/b/a Temple-Inland Inc.

William "Bill" Campbell

Tamala Julian

David Kellam

Susan Kosiba

Leonard "Michael" Latham

Pat Maley

Steven Raley

Gaylon "Bruce" Shrader

Ralph Stagner

James "Jay" Wyatt

Melissa Chumley

Brenda Elliott

USG Corporation/United States Gypsum Company

Scott Blanchard

Matthew Byrne

Elaine Chapa

Kevin Courtney

Christopher Griffin

Christopher Lawson

James Metcalf

Gregory Salah

Gerald Emili	Donald Brandt
Robbe Pearson	Jeffrey Broker
Ike Preston	Bruce Dunning
Eric Rodgers	John Durrant
Isabelle Shiffrin	Greg Kovacs
Rob Anderson	Stephen Leyden
Brian Ponder	Bruce Nameth
Charles Flack	Debra Ortiz
Ed Green	John Pappas
Debbie Master	Mike Toole
Wayne Wilson	Dean Updegrove
New NGC, Inc. (“National Gypsum”)	Steve Bjorklund
John Corsi	Patrick Desmond
Scott Crutchfield	Mark Garland
Bill Kelly	Joseph Holmes
John Mixson	Curtis Malone
Craig Weisbruch	Kevin Moyer
Kurt Withrock	Perry Tuttle
Duane Wood	Srinivas Veeramasuneni
Scott Carlsen	Bill White
Tom Cusack	
Lee Holder	

Phil Redmon

Bob Couche

Maurice Ditchard

Tom Harwood

Tim Hessert

Matt London

Steve Martinez

Chris Pinckney

Frank Stola

Todd Broud

Eli Stav

(ii) Categories of documents and electronically stored information maintained by the Direct Purchaser Plaintiffs which they may use to support their claims:

Each Direct Purchaser Plaintiff maintains purchasing records or data and any other documents or data relating to purchases of drywall from Defendants at the following locations:

Grubb Lumber Company, Inc.:

Grubb Lumber Company, Inc.

200 A Street

Wilmington, DE 19801

Janicki Drywall, Inc.:

Janicki Drywall, Inc.

5400 E. Lake Road

Erie, PA 16511

New Deal Lumber & Millwork Co., Inc.:

New Deal Lumber & Millwork Co., Inc.

5149 Lancaster Avenue
Philadelphia, PA 19131

Sierra Drywall Systems, Inc.:

Sierra Drywall Systems, Inc.
4716 North Perryville Rd.
Litchfield Park, AZ 85340

Direct Purchaser Plaintiffs may also use statements or other information from the following publications and/or articles to support their claims:

1. Longbow Research Survey (April 2, 2012 and December 18, 2012).
2. Longbow Research Industry Update (October 11, 2011).
3. Global Gypsum Magazine (*Global Gypsum Evolution: Where to Now?*, January 12, 2012).
4. Finance & Commerce (*Not good timing: Drywall prices rising*, Feb. 16, 2012)
5. Thompson Research Group Flashnote (October 3, 2011).
6. J.P. Morgan North America Equity Research Report: USG Corporation (February 27, 2013).

(iii) Computation of damages claimed:

Direct Purchaser Plaintiffs claim overcharge damages to the proposed class. Calculation of those overcharges is premature until discovery is obtained from Defendants sufficient to allow the overcharges to be determined.

(iv) Insurance Agreements:

This is not applicable to Direct Purchaser Plaintiffs.

Dated: August 30, 2013

/s/ H. Laddie Montague, Jr.

H. Laddie Montague, Jr.
Eric L. Cramer
Ruthanne Gordon
Michael C. Dell'Angelo
Candice J. Enders
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103
Tel: (215) 875-3000
Email: hlmontague@bm.net
ecramer@bm.net
rgordon@bm.net
mdellangelo@bm.net
cenders@bm.net

/s/ Eugene A. Spector

Eugene A. Spector
Jeffrey J. Corrigan
Jay S. Cohen
Jeffrey L. Spector
Rachel E. Kopp
SPECTOR ROSEMAN KODROFF &
WILLIS, P.C.
1818 Market Street, Suite 2500
Philadelphia, PA 19103
Tel: (215) 496-0300
Email: espector@srgkw-law.com
jcorrigan@srgkw-law.com
jcohen@srgkw-law.com
jspector@srgkw-law.com
rkopp@srgkw-law.com

Respectfully submitted,

/s/ Kit A. Pierson

Kit A. Pierson
Richard A. Koffman
Brent W. Johnson
Jeff Dubner
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Ave., NW
Suite 500 West
Washington, DC 20005
Tel: (202) 408-4600
Email: kpierson@cohenmilstein.com
rkoffman@cohenmilstein.com
bjohnson@cohenmilstein.com
jdubner@cohenmilstein.com

Interim Co-Lead Counsel for Direct Purchaser Plaintiffs and the Proposed Class